

LAW OFFICES

NEAL, GERBER & EISENBERG LLP

PLEASE REMIT CHECKS TO:
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TWO NORTH LA SALLE STREET
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(312) 269-8000
F.E.I.N. 36-3532950

Mr. Steve Holmberg
President
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269 Pail's Street
Mililani, Hawaii 96789

August 27, 2013
Invoice 235813
Page 1

For Services Through July 31, 2013
Our Matter # 02302N.0803
SwimWays Claims

07/01/13 [Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

07/08/13

07/09/13

07/10/13

07/10/13

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07/11/13 [Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

07/11/13

07/15/13

07/16/13

07/16/13

07/17/13 Call from HIC's counsel re: discovery issues (.1); conferences re: HIC's discovery privilege assertions and status of amended complaint (.5).
C. D. Mickus 0.00 hrs.

07/17/13 [Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

07/18/13

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[Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

07/18/13

07/18/13 [Redacted] telephone conference with opposing counsel concerning invocation of attorney-client privilege and nature of redacted documents;

E.Y. Choi 0.00 hrs.

07/19/13 [Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

07/19/13

07/21/13

07/22/13

07/22/13

07/22/13

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[Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

07/23/13

07/23/13

07/25/13

07/25/13 [Redacted]
conferring with opposing counsel (PSG/HIC) concerning sufficiency of
document production.

E.Y. Choi 1.20 hrs.

07/26/13 [Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

07/30/13

07/30/13 Confer with opposing counsel concerning sufficiency of HIC's
document production, and thereafter, prepare correspondence to same
pursuant to Rule 37 of Federal Rules of Civil Procedure.

E.Y. Choi 1.20 hrs.

07/31/13 [Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

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07/31/13 [Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

Total Fees For Professional Services	\$ [Redacted]
Less 10% Discount	\$
Total Fee Amount Due.....	\$

Reimbursable Costs

[Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

Totals For This Matter

Current Amount Due.....	\$
Balance Forward	\$
Total Due	\$

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Invoice 237249
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For Services Through August 31, 2013
Our Matter # 02302N.0803
SwimWays Claims

08/06/13 [Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

08/06/13

08/07/13

08/08/13

08/08/13

08/08/13

08/09/13

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[Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

08/09/13

08/12/13

08/12/13

08/13/13

08/15/13

08/20/13 Call with counsel for HIC re: discovery issues; conference with E. Choi
re: same; evaluation of motion or further contact with HIC re: discovery
issues.

C. D. Mickus 1.10 hrs.

08/20/13 Prepare for and participate in conference call with counsel for HIC and
C. Mickus to discuss deficiencies in HIC's discovery responses;
[Redacted]

E.Y. Choi 1.10 hrs.

08/27/13 [Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

08/28/13

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[Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

08/28/13

08/28/13

08/29/13

08/29/13

08/29/13

08/30/13

08/30/13

08/30/13

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[Redacted]
Total Fees For Professional Services \$
Less 10% Discount \$
Total Fee Amount Due \$

Reimbursable Costs

Reproduction of Documents

Total Reimbursable Costs \$

Totals For This Matter

Current Amount Due \$
Balance Forward \$
Total Due \$

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December 31, 2013
Invoice 243509
Page 1

For Services Through November 30, 2013
Our Matter # 02302N.0803
SwimWays Claims

11/01/13 [Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

11/01/13

11/04/13

11/05/13 [Redacted]
evaluate motion for sanctions
conference with E.
Choi re: motion and supporting affidavit; review of Rule 37 and 28 USC
Section 1927 re sanctions; begin drafting motion for sanctions;

C. D. Mickus 1.50 hrs.

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11/05/13 [Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

11/06/13

11/07/13 Continue work/evaluation of sanctions issues, etc. in advance of settlement conference.

C. D. Mickus 0.60 hrs.

11/07/13 [Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

11/08/13 [Redacted]

evaluation of motion for sanctions;
preparation of email to counsel for HIC re: same; review of supplemental document production.

C. D. Mickus 2.50 hrs.

11/08/13 [Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

11/08/13 Review and revise email to T. Kobayashi concerning improper conduct in discovery.

E.Y. Choi 0.30 hrs.

11/11/13 [Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

11/11/13

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[Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

11/12/13

11/13/13

11/14/13	Review HIC's third supplemental document product and privilege log concerning redactions of same, and prepare letter to counsel for HIC concerning deficiencies in same.	E.Y. Choi	1.60 hrs.
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11/15/13 [Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

11/18/13

11/18/13

11/22/13 Conference with counsel for SwimWays, counsel for HIC and E. Choi
re: motion to compel and for sanctions [Redacted]

C. D. Mickus 2.70 hrs.

11/22/13 Meet and confer with C. Mickus to discuss strategy for filing motion to compel and for sanctions as against HIC for discovery misconduct.

E.Y. Choi 0.40 hrs.

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11/25/13 Draft motion for sanctions and to compel outlining history of discovery dispute and misconduct.

E.Y. Choi 6.90 hrs.

11/26/13 Continue to draft motion to compel and for sanctions; and draft affidavit in support of same.

E.Y. Choi 2.70 hrs.

Total Fees For Professional Services \$ Redacted

Less 10% Discount \$
Total Fee Amount Due..... \$

Reimbursable Costs

[Redacted - Not Relevant to Making of Motion to Compel and for Sanctions]

Lexis Research 43.18
Westlaw Research 213.84

Total Reimbursable Costs \$ Redacted

Totals For This Matter

Current Amount Due..... \$

Balance Forward \$

Total Due \$